

## EXHIBIT 2

**From:** [Lauren E. Phillips](#)  
**To:** [Rachel Jensen](#); [Benjamin Gruenstein](#); [Lauren Rosenberg](#)  
**Cc:** [Francisco Mejia](#); [Megan Rossi](#); [Raffi Friedman](#); [Dan Drosman](#); [Nicole Gilliland](#)  
**Subject:** RE: In re Anadarko Petroleum Corp. Sec. Litig., No. 4:20-cv-00576 (S.D. Tex.)  
**Date:** Tuesday, March 14, 2023 4:57:33 PM

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EXTERNAL SENDER

Rachel,

Mr. Murphy's report goes to scienter, on which Defendants do not have the burden of proof. Accordingly, his report was timely filed on January 25, 2023, independent of Regan's report, and need not be withdrawn on the basis that you have partially withdrawn Regan's report.

Best,  
Lauren

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**From:** Rachel Jensen <[RachelJ@rgrdlaw.com](mailto:RachelJ@rgrdlaw.com)>  
**Sent:** Sunday, March 12, 2023 5:55 PM  
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**Subject:** In re Anadarko Petroleum Corp. Sec. Litig., No. 4:20-cv-00576 (S.D. Tex.)

Counsel:

Pursuant to the Court's October 11, 2022 Amended Scheduling and Docket Control Order (Dkt. No. 142), expert designations and rebuttal expert designations were due by November 9, 2022 and January 25, 2023, respectively. On November 9, 2022, Plaintiffs served the Expert Report of D. Paul Regan, CPA/CFF ("Regan Report"). On January 25, 2023, Defendants served the Rebuttal Report of Kevin J. Murphy ("Rebuttal Murphy Report"), which purports to rebut portions of the Regan Report that reference executive compensation.

Plaintiffs hereby withdraw Mr. Regan's opinion regarding executive compensation in paragraphs 77(c) and 86 of his report. Given that the Murphy Rebuttal does not purport to rebut or contradict any of Mr. Regan's remaining opinions or any other opinion offered by Plaintiffs' other experts, Murphy's "rebuttal opinions are necessarily irrelevant." *LaSalle Bank Nat. Ass'n v. CIBC Inc.*, 2012

WL 466785, at \*22 (S.D.N.Y. Feb. 14, 2012); *see e.g., Spencer v. Peters*, 2013 WL 74447, at \*1 (W.D. Wash. Jan. 7, 2013).

Please confirm by Tuesday, March 14, 2023, that Defendants will withdraw the Rebuttal Murphy Report.

Best,  
Rachel

**Rachel L. Jensen**

Partner



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